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RochesterTel

October 12, 1994

BY OVERNIGHT MAIL

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: CC Docket No. 94-54

Dear Mr. Caton:

Enclosed for filing please find an original plus nine (9) copies of the Reply Comments of Rochester Telephone Corporation in the above-docketed proceeding.

To acknowledge receipt, please affix an appropriate notation to the copy of this letter provided herewith for that purpose and return same to the undersigned in the enclosed, self-addressed envelope.

Very truly yours,

Michael J. Shortley, III

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Equal Access and Interconnection	)	**CC Docket No. 94-54**
Obligations Pertaining to	)	
Commercial Mobile Radio Services	)	

REPLY COMMENTS OF ROCHESTER TELEPHONE CORPORATION

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October 12, 1994

Table of Contents

Summary

Rochester submits this reply to the comments received in response to the Commission's Notice initiating this proceeding. The comments make clear that: (a) if the Commission decides to mandate equal access, it should apply that requirement to all broadband CMRS providers and do so in a reasonably consistent manner; (b) exchange carrier interconnection arrangements need not be subject to tariffing requirements; and (c) the market should determine appropriate CMRS-to-CMRS interconnection and CMRS resale requirements.

First, whatever the merits of equal access, it is now a fact of life for cellular carriers that serve a large proportion of cellular subscribers. The Commission should mandate that all CMRS providers that offer services actually or potentially competitive with cellular service (including existing cellular carriers that are not currently subject to an equal access requirement) offer 1+ equal access. The historical origins of the MFJ's cellular equal access requirements are irrelevant. To implement section 332 of the Communications Act properly and to eliminate existing competitive disparities stemming from an equal access requirement that only affects one group of wireless carriers, the Commission should mandate equal access for all broadband CMRS providers.

In doing so, however, the Commission should rationally define wireless local service areas. In its comments, Rochester proposed that the Commission define the local service area as that authorized for the particular service involved. Because different CMRS providers have different Commission-authorized service territories, this proposal does create some disparity among CMRS providers. Nonetheless, it offers CMRS providers the

flexibility to design their local calling areas and is administratively simple to implement. Pleas for smaller local calling areas are largely designed to benefit interexchange carriers, not wireless customers who want large local calling areas.

Second, the Commission need not require the tariffing of exchange carrier interconnection arrangements. There is no credible evidence in the record that the current system of good faith negotiation is failing and, therefore, there is no reason to subject such arrangements to rate or tariff regulation. Cox and MCI, which want this Commission to scrutinize those arrangements, provide only vague and conclusory allegations that the current system is not working. That is not enough for the Commission to reverse a decade-old policy.

Third, the Commission should let the market determine appropriate CMRS-to-CMRS interconnection and resale arrangements. Cellular is currently highly competitive; enhanced SMR service is a direct competitor of cellular; and 120 MHz of additional spectrum is about to be licensed for PCS. In this environment, the Commission should rely upon competition -- not regulatory fiat -- to determine appropriate interconnection arrangements.

With respect to resale, Rochester does not oppose switch-based resale, provided that it may establish market-based rates for such resale arrangements. The Commission should not export its *Expanded Interconnection* paradigm into the wireless environment. This type of regulation, adopted for exchange carriers in that proceeding, is both unnecessary and inappropriate in the wireless environment.

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REPLY COMMENTS OF ROCHESTER TELEPHONE CORPORATION

Introduction

Rochester Telephone Corporation ("Rochester"), on behalf of its exchange, interexchange and wireless operations, submits this reply to the comments received in response to the Commission's Notice initiating this proceeding.[1] The comments make clear that: (a) if the Commission decides to mandate equal access, it should apply that requirement to all broadband commercial mobile radio service ("CMRS") providers and do so in a reasonably consistent manner; (b) exchange carrier interconnection arrangements need not be subject to tariffing requirements; and (c) the market should determine appropriate CMRS-to-CMRS interconnection and CMRS resale requirements.

First, whatever the merits of equal access, it is now a fact of life for cellular carriers that serve a large proportion of cellular subscribers. The Commission should mandate that all CMRS providers that offer services actually or potentially competitive with cellular service (including existing cellular carriers that are not currently subject to an equal access

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1 *Equal Access and Interconnection Obligations Pertaining to Commercial Radio Services*, CC Dkt. 94-54, Notice of Proposed Rule Making and Notice of Inquiry, FCC 94-145 (July 1, 1994) ("Notice").

requirement) offer 1+ equal access.[2] The historical origins of the MFJ's cellular equal access requirements[3] are irrelevant. To implement section 332 of the Communications Act properly and to eliminate existing competitive disparities stemming from an equal access requirement that only affects one group of wireless carriers, the Commission should mandate equal access for all broadband CMRS providers.

In doing so, however, the Commission should rationally define wireless local service areas. In its comments, Rochester proposed that the Commission define the local service area as that authorized for the particular service involved.[4] Because different CMRS providers have different Commission-authorized service territories, this proposal does create some disparity among CMRS providers. Nonetheless, it offers CMRS providers the flexibility to design their local calling areas and is administratively simple to implement. Pleas for smaller local calling areas[5] are largely designed to benefit interexchange carriers, not wireless customers who want large local calling areas.[6]

Second, the Commission need not require the tariffing of exchange carrier interconnection arrangements. There is no credible evidence in the record that the current system of good faith negotiation is failing and, therefore, there is no reason to subject such

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2 Through Upstate Cellular Network ("Upstate") -- a joint venture between Rochester and NYNEX Corporation -- Rochester's principal wireless operations are subject to the equal access requirements of the *Modification of Final Judgment* ("MFJ").

3 *E.g.*, Century at 13-14; GTE at 19-21.

4 Rochester at 7-8.

5 *E.g.*, MCI at 4-6.

6 *E.g.*, GTE at 9-10; Southwestern Bell at 35.

arrangements to rate or tariff regulation. Cox and MCI, which want this Commission to scrutinize those arrangements, provide only vague and conclusory allegations that the current system is not working.[7] That is not enough for the Commission to reverse a decade-old policy.

Third, the Commission should let the market determine appropriate CMRS-to-CMRS interconnection and resale arrangements. Cellular is currently highly competitive; enhanced specialized mobile radio ("SMR") service is a direct competitor of cellular; and 120 MHz of additional spectrum is about to be licensed for personal communications services ("PCS"). In this environment, the Commission should rely upon competition -- not regulatory fiat -- to determine appropriate interconnection arrangements.

With respect to resale, Rochester does not oppose switch-based resale, provided that it may establish market-based rates for such resale arrangements. The Commission should not export its *Expanded Interconnection* paradigm[8] into the wireless environment. This type of regulation, adopted for exchange carriers in that proceeding, is both unnecessary and inappropriate in the wireless environment.

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[7] Cox, *passim*; MCI at 11-12.

[8] *See, e.g., Expanded Interconnection with Local Telephone Company Facilities*, CC Dkt. 91-141, Memorandum Opinion and Order, FCC 94-190 (July 25, 1994).

Argument

I. THE COMMISSION SHOULD ADOPT A REASONABLE EQUAL ACCESS PLAN FOR CMRS PROVIDERS.

Equal access may well not provide all the benefits that its proponents suggest.[9] Nonetheless, with the MFJ and the AT&T/McCaw consent decree (if approved),[10] equal access will be mandatory for cellular carriers that currently serve a large proportion of all cellular subscribers. Whether good or bad public policy, equal access is a fact of life. The Commission should craft its equal access policies with this fact firmly in mind by: (a) mandating equal access for all broadband CMRS providers;[11] and (b) adopting a rational definition of a local calling area for equal access purposes.

A. The Commission Should Mandate the Provision of Equal Access by Broadband CMRS Providers.

A principal purpose of section 332 of the Communications Act is to provide regulatory parity among similarly-situated CMRS providers.[12] Thus, to the extent that the Bell companies and AT&T/McCaw must provide equal access, the Commission should

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9 *Compare* AT&T at 3-7; MCI at 2-3 *with* Bell Atlantic at 11-12; NYNEX at 4-6.

10 *See United States v. AT&T Corp.*, C.A. No. 94-01555, Stipulation (D.D.C. filed July 15, 1994).

11 By "broadband CMRS," Rochester means cellular service and other wireless services, such as enhanced SMR and broadband PCS, that are actually or potentially competitive with cellular.

Equal access may not make any technical or economic sense for narrowband services, such as paging, air-to-ground and the like. *See, e.g.*, GTE at 29-36. Rochester does not suggest that the Commission require providers of such services to offer equal access.

12 *See Regulatory Treatment of Mobile Services*, GN Dkt. 93-252, Second Report and Order, 9 FCC Rcd. 1411, 1418, ¶ 13 (1994) ("*Regulatory Treatment*").

adopt an equal access requirement for all broadband CMRS providers. One set of competitors should not be subject to burdens that others in the market do not face. This type of differential regulation distorts the competitive process and benefits no one, save the protected class of competitors. Even those opposed to any equal access requirement -- which Rochester is not -- agree that such parity is essential.[13]

The arguments against an equal access mandate are unavailing. That an equal access obligation first arose in antitrust litigation against the former Bell System[14] is irrelevant. The authors of the MFJ probably never thought of the possibility that equal access obligations would even pertain to wireless operations.[15] Nonetheless, the obligation exists. So long as this remains the case, all similarly-situated CMRS should be subject to the same rules of the game.

In approving the AT&T/McCaw merger, the Commission did not accept this analysis.[16] However, the Commission reserved judgment on whether generally to apply an equal access obligation to wireless providers[17] and AT&T and McCaw have agreed voluntarily to implement equal access. The Commission's approach may well have been correct in the context of the approval of transfer of control applications. It is inappropriate in a notice and comment rulemaking proceeding. The fact remains that one set of

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13 *E.g.*, Ameritech at 1-3; NYNEX at 3-8.

14 *E.g.*, Century at 13-14; GTE at 19-21.

15 Rochester at 4 n.6.

16 *Craig O. McCaw*, File No. ENF-93-44, Memorandum Opinion and Order, FCC 94-238 (Sept. 19, 1994).

17 *Id.*, ¶ 70.

competitors faces regulatory obstacles that another set of competitors does not face. This differential treatment is totally inconsistent with section 332 of the Communications Act, as the Commission recognizes.[18]

The costs of conversion to equal access for non-Bell company cellular carriers and other broadband CMRS providers should also be a non-issue. The Bell companies have converted even the smaller markets that they operate to equal access.[19] In light of this history, the claims of a number of cellular companies that conversion to equal access will impose economic hardship on them[20] should be viewed with suspicion.[21]

Moreover, the cost of converting to equal access many be addressed in three ways. First, the Commission should continue to permit, as it has,[22] cellular carriers to recover their equal access conversion costs from interexchange carriers. Second, an equal access obligation should only be triggered by a *bona fide* request for equal access.[23] Third, if all else fails, the Commission should rely, much as the MFJ court has, on the waiver process

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18 Notice, ¶ 39.

19 As Rochester described in its comments (Rochester at 6 n.15), Upstate has converted the New York Rural Service Area 1 and the relatively small Utica-Rome Metropolitan Statistical Area to equal access.

20 *E.g.*, Century at 4-5; GTE at 17.

21 The claims of several parties (*e.g.*, Century at 7-8; GTE at 7-8) that customers can reach their preferred interexchange carriers by 1-800 or 950 dialing arrangements is irrelevant. If one set of similarly-situated customers must provide 1+ equal access, then all should be subject to the same requirements.

22 *See Regulatory Treatment*, 9 FCC Rcd. at 1480, ¶ 179.

23 In this regard, if Century, for example (Century at 10-11), is right that there is no demand for equal access in particular markets, then it should not receive *bona fide* requests for equal access in those markets.

to exempt particular markets from the equal access process on the basis of a showing that the costs of converting a particular market to equal access clearly outweigh the benefits to be obtained thereby.[24]

The merits of wireless equal access are essentially irrelevant to the Commission's decision-making process. Equal access obligations now exist for those cellular carriers that serve a large proportion of the nation's cellular subscribers. Competitors of those providers -- cellular, PCS or SMR -- should be subject to those same requirements.

B. The Commission Should Define Local Calling Areas with Respect to Commission-Authorized Wireless Service Territories.

The Commission's rules establish different service territories depending upon the particular service involved. The Commission should take this circumstance into account in defining the local service area for equal access purposes. The requests for the Commission to presubscribe a uniform service area for all CMRS providers emanate from two concerns: (a) permitting interexchange carriers to gobble up as much wireless traffic as possible;[25] and (b) parity with the LATA-bound definitions contained in the MFJ and the AT&T/McCaw consent decree.[26] Neither concern should mandate strict uniformity.

The claim that the Commission should define local calling areas with respect to the telephone LATAs to bring the "benefits" of interexchange competition to wireless services

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24 As Rochester suggested in its comments (Rochester at 7 n.17), the Commission should adopt the cost/benefit approach contained in the MFJ rather than the technology-based standard contained in its rules for the non-Bell and non-GTE exchange carriers.

25 *See, e.g.*, MCI at 4-6.

26 *See, e.g.*, AT&T at 11; Bell Atlantic at 12.

is meritless. As Southwestern Bell convincingly demonstrates,[27] wireless customers demand large local calling areas. Artificially restricting wireless local calling areas to LATAs will needlessly prevent wireless carriers from meeting this customer demand. There is no reason for the Commission to mandate this anti-consumer outcome.

Similarly, although the MFJ does utilize LATAs to define local service areas for equal access purposes, the goal of regulatory parity does not compel the Commission to adopt LATAs as the local calling area for purposes of any equal access rules that it adopts.[28] Even most parties that request the Commission to adopt LATAs admit that they are not appropriate local calling areas.[29]

The Commission can devise a regulatory model that comes close to achieving parity by permitting CMRS providers effectively to define their own local calling areas. It may do so by defining a local calling area with respect to the particular service and market involved, including all Commission-authorized extensions to or consolidations of such service areas.[30] The approach would permit CMRS providers to respond to consumer demand in the initial design and expansion of their systems, yet preserve whatever benefits equal access may bring for wireless interexchange traffic. Defining the local service area with respect to the authorized service area for the license involved will effectively achieve

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27 Southwestern Bell at 35 *ff.*

28 *Compare* Bell Atlantic at 7-12; BellSouth at 28, 38.

29 *See id.*

30 To the extent that MFJ waivers are required, companies would remain free -- as they currently are -- to seek such waivers. Moreover, this issue could well become moot if the Bell companies' generic interexchange wireless motion is granted.

regulatory parity without unduly restricting the ability of wireless providers to meet consumer demand.[31]

II. THE COMMISSION SHOULD NOT REQUIRE THE TARIFFING OF EXCHANGE CARRIER INTERCONNECTION OFFERINGS.

Most parties that have addressed this issue -- including exchange carriers,[32] wireless providers[33] and interexchange carriers[34] -- agree that the current system of good faith negotiation regarding the terms and conditions of exchange carriers' interconnection arrangements is working well and, therefore, there is no reason to require the tariffing of such interconnection arrangements.

Cox and MCI contend that closer Commission scrutiny of such arrangements is warranted because of the risk of discrimination and/or unreasonable conduct.[35] These claims are unfounded. MCI provides only conclusory allegations that a tariffing requirement is necessary, but provides absolutely no facts to support the claim. Cox, for

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31 Certain parties also suggest that wireless carriers make available, on an equal access basis, access to their billing information and data bases. *E.g.*, MCI at 10-11. The Commission should decline this invitation. Interexchange carriers will, presumably, know the identity of their presubscribed customers and will have, from their own records, the information necessary to bill those customers. For customers utilizing 10xxx access, Rochester does not oppose providing billing name and address information, under negotiated arrangements, to enable interexchange carriers to bill for such calls, or entering into billing and collection agreements. Additional information is simply not necessary for the only legitimate reason that interexchange carriers need information on wireless carriers' customers -- to bill for services that they rendered.

32 *E.g.*, Ameritech at 4; Bell Atlantic at 13-15.

33 *E.g.*, GTE at 37-45; McCaw at 23-25.

34 *E.g.*, AT&T at 12-13.

35 Cox, *passim*; MCI at 11-12.

its part, advances the hypothetical that an exchange carrier will agree with an affiliated wireless carrier to unreasonably high interconnection rates and then impose those rates on unaffiliated wireless providers.[36] Cox, however, can neither: (a) provide a single example of where this has occurred; nor (b) explain why a wireless affiliate that may be a partnership that has unaffiliated partners to whom the wireline partner has independent fiduciary obligations would -- or could -- agree to such an outcome. Moreover, the fact that most cellular carriers -- including predominantly non-wireline companies -- support continuation of the *status quo*[37] demonstrates that Cox's analysis is more hypothetical than real. The truly affected parties -- exchange and cellular carriers -- favor continuation of the good faith negotiation process. The Commission should not disturb that judgment.[38]

III. THE COMMISSION SHOULD ADOPT REASONABLE INTERCONNECTION AND RESALE REQUIREMENTS.

Virtually no party supports the promulgation of regulations governing -- or the tariffing -- of CMRS-to-CMRS interconnection arrangements. Similarly, except for the National Cellular Resellers Association ("NCRA"), virtually no party suggests that the Commission adopt detailed regulations governing resale. The consensus view is correct.

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36 Cox at 6.

37 *E.g.*, McCaw at 23-25.

Surely, if McCaw did not favor continuation of the good faith negotiation process for this reason, it would have said so in forceful terms.

38 In addition, imposing a tariffing requirement would also introduce undue rigidity and delay in the development of new interconnection arrangements.

A. Detailed Regulations Governing CMRS-to-CMRS Interconnection Are Unnecessary.

In the very near future, numerous broadband CMRS providers will be operational. Thus, the wireless business will be intensely competitive. Indeed, this business is already highly competitive today. To the extent that CMRS-to-CMRS interconnection arrangements make economic sense, the market will guarantee their existence. As Rochester noted in its comments,[39] CMRS providers will have every incentive to enter into commercially reasonable interconnection arrangements or risking losing revenue from the receipt or delivery of interconnected traffic. For this reason, it is not surprising that the vast majority of parties resist extensive regulation of such arrangements.[40] There is no reason for the Commission to adopt detailed regulations governing such interconnection arrangements.[41]

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39 Rochester at 10-11.

40 NCRA suggests that the Commission subject CMRS-to-CMRS interconnection arrangements to extensive regulation, but does so largely in response to its concerns regarding resale. NCRA at 12 *ff.* Rochester addresses those concerns in Part III, B., *infra.*

41 Several parties suggest that the Commission preempt, at this time, state regulation of the terms of CMRS-to-CMRS interconnection. *See, e.g.,* McCaw at 18-20. Although Rochester agrees that inconsistent state regulation has the potential to frustrate important federal policies, it suggests that the Commission adopt a "wait-and-see" approach, but be prepared to preempt actual state regulation that has the potential to create such mischief.

B. The Commission Should Decline To Regulate Extensively the Resale of Wireless Services.

NCRA wants the Commission to become extensively involved in overseeing the terms and conditions applicable to the resale of wireless services.[42] It also asks the Commission to adopt some, albeit unspecified, version of its exchange carrier *Expanded Interconnection* paradigm for wireless providers.[43] Neither approach is necessary or desirable.

The Commission's existing rules make clear that resale may not be prohibited or unnecessarily restricted.[44] While the Commission should reaffirm that the principle applies to all broadband CMRS providers, additional regulation is unnecessary. With the imminent advent of multiple wireless networks, the ability of wireless resellers to reach mutually acceptable arrangements with wireless licensees will be virtually unconstrained.[45] In this type of multiple-vendor environment, there is no justification for imposing upon CMRS licensees onerous obligations to address a problem that does not exist.

The *Expanded Interconnection* paradigm posited by NCRA has no applicability to wireless services. The type of network unbundling that the Commission mandated for

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42 NCRA, *passim*.

43 *Id.* at 12-13.

44 *See* Rochester at 12.

45 Indeed, in today's environment, with fewer facilities-based wireless providers than will exist in a few years, NCRA can point to only one example of a dispute over switch-based resale. NCRA at 3. Nonetheless, to the extent that the Commission believes that it should clarify its resale policy explicitly to include switch-based resellers, Rochester would have no objection.

exchange carriers -- which Rochester's Tier 1 exchange operations have implemented[46] -- simply is inapplicable to a wireless network. Indeed, NCRA cannot specify the discreet wireless network elements that it wants offered on an unbundled basis. A reseller's switch cannot operationally interconnect with individual cell sites, which is something NCRA apparently does not advocate in any event.[47] The different network architectures and technologies of landline and wireless networks render the *Expanded Interconnection* analogy meaningless.

At bottom, NCRA simply desires rate regulation of CMRS providers' offerings that may be useful to resellers. Such an approach is unnecessary. The cellular business today is competitive[48] and CMRS will be more intensely competitive as enhanced SMR providers expand their current operations and broadband PCS providers construct and operate their systems. Whatever market power exchange carriers possess in the interstate access business, wireless providers exert no such influence.[49] Thus, the reasons that led the

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46 Despite the decision of the United States Court of Appeals for the District of Columbia Circuit vacating the Commission's physical collocation requirements *(Bell Atlantic v. FCC,* 24 F.3d 1441 (D.C. Cir. 1994)), Rochester chose to continue to offer physical collocation voluntarily on a common carrier basis.

47 NCRA, Ex. A at 1.

48 NCRA's citation to the Department of Justice's memorandum in response to the Bell companies' generic wireless interexchange waiver motion (NCRA at 10-11) is unavailing. The Department's analysis principally addressed the competitive effect on the interexchange market of permitting the Bell companies to offer interexchange services, without a corresponding equal access requirement, in connection with their wireless operations. It did not address competitive opportunities for the resale of wireless services.

49 Given the number of potential and imminent entrants -- not to mention existing wireless providers -- if a reseller cannot negotiate a satisfactory interconnection arrangement with one broadband CMRS provider, it will certainly be able to do so with others.

Commission to adopt its *Expanded Interconnection* regime do not apply in the wireless environment.

The Commission should reject NCRA's request for extensive regulation of the rates, terms and conditions applicable to the resale of wireless services.

Conclusion

For the foregoing reasons, the Commission should act upon the proposals contained in the Notice in a manner consistent with the suggestions contained herein and in Rochester's comments.

Respectfully submitted,

Michael J. Shortley, III

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Attorney for Rochester
Telephone Corporation

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October 12, 1994

Certificate of Service

I hereby certify that, on this 12th day of October, 1994, copies of the foregoing Reply Comments of Rochester Telephone Corporation were served by first-class mail, postage prepaid, upon the parties on the attached service list.

Michael J. Shortley, III

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